# UNITED STATES DISTRICT COURT EASTERN DISTRICT OF PENNSYLVANIA

DOUGLAS PIERSON,	)	
	)	
	)	
Plaintiff,	)	
	)	
V.	)	Civil Action No. 2:17-cv-02739-TJS
	)	
UNITED STATES OF AMERICA,	)	
	)	
Defendant.	)	

### PLAINTIFF'S MOTION FOR ADMISSION OF COUNSEL PRO HAC VICE

Plaintiff Douglas Pierson, by counsel, applies for the admission of Glen H. Sturtevant, Jr. of the Virginia law firm of RawlsMcNelis, P.C., as counsel for Plaintiff in this action, and in support of this motion states as follows:

- 1. Glen H. Sturtevant, Jr. is a member in good standing of the Virginia State Bar.
- 2. The law office of RawlsMcNelis, P.C. is located at 211 Rocketts Way, Suite 100, Richmond, VA 23231.
- 3. Glen H. Sturtevant, Jr. is admitted to practice before all courts of the Commonwealth of Virginia, as well as the United States Supreme Court, the Fourth Circuit Court of Appeals, and the Eastern and Western Districts of Virginia.
- 4. Glen H. Sturtevant, Jr. is in good standing in all of the Bars in which he is a member and has not been disbarred or censured by any court or by any state bar association.
  - 5. There are no pending disciplinary proceedings against Glen H. Sturtevant, Jr.
- 6. Attached is the verified application of Glen H. Sturtevant, Jr., which is submitted in support of this motion.

7. Further, pursuant to the Court Policies and Procedures regarding *Pro Hac Vice* Motions, Glen H. Sturtevant, Jr. provides the additional required information below:

## **ATTORNEY ADMISSIONS**

Virginia	10/03/2006	73458
(State where admitted)	(Admission date)	(Attorney Bar No.)
Western District Virginia	09/24/2009	73458
(State where admitted)	(Admission date)	(Attorney Bar No.)
Eastern District of Virginia	10/14/2009	73458
(State where admitted)	(Admission date)	(Attorney Bar No.)
4th Circuit Court of Appeals	5/17/2010	73458
(Court where admitted)	(Admission date)	(Attorney Bar No.)
U.S. Supreme Court	11/15/2010	73458
(Court where admitted)	(Admission date)	(Attorney Bar No.)

# WHY THE PARTY DESIRES THE ATTORNEY TO PARTICIPATE AND WHY THE ATTORNEY IS ESPECIALLY QUALIFIED TO DO SO

This medical malpractice suit arises under the Federal Tort Claims Act because it involves medical care provided to Mr. Pierson at the Philadelphia VA Medical Center. Mr. Sturtevant has represented Mr. Pierson throughout the course of this matter, beginning with the filing of the administrative tort claim with the Department of Veterans Affairs. Because a resolution of the administrative claim could not be reached with the VA, Mr. Pierson has authorized Mr. Sturtevant to file this lawsuit on his behalf.

Mr. Sturtevant has extensive experience in medical malpractice litigation and represents veterans and their family members in medical malpractice litigation all around the country. Mr. Sturtevant has retained Richard L. Frankel of Bross & Frankel, P.A. to serve as local counsel in this case, but the case will primarily be prepared for trial and tried by Mr. Sturtevant.

Dated this 29<sup>th</sup> day of June, 2017.

Respectfully submitted,

**DOUGLAS PIERSON** 

By: s/Richard L. Frankel\_

Richard L. Frankel Bross & Frankel, P.A.

102 Browning Lane, Bldg. C-1

Cherry Hill, NJ 08003

(856) 795-8880

(856) 795-1242 – Facsimile rich@brossfrankel.com

Counsel for Plaintiffs

#### **CERTIFICATE OF SERVICE**

I certify that on June 29, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF System, which will send notice of such filing to the following registered CM/ECF Users:

Joel Sweet, Esq. Assistant United States Attorney Eastern District of Pennsylvania 615 Chestnut St., Ste. 1250 Philadelphia, PA 19106

By: s/Richard L. Frankel\_\_\_\_

Richard L. Frankel Bross & Frankel, P.A. 102 Browning Lane, Bldg. C-1 Cherry Hill, NJ 08003 (856) 795-8880 (856) 795-1242 – Facsimile

rich@brossfrankel.com
Counsel for Plaintiffs